

FILED
HARRISBURG, PA

MAR 01 2023

IN THE
UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

PER Dr
DEPUTY CLERK

George Ivan Lopez,)	
)	Hon: Christopher C. Conner
Plaintiff,)	Hon: M.J. Karoline
Mechalechick)	
Vs.)	
)	Case No: 3:21-cv-1819
John Wetzel, et al.,)	
Defendants.)	

**PLAINTIFF GERALD WATKINS, FIRST
REQUEST FOR ADMISSIONS**

Pursuant to Fed. R. Civ. P. (36), Plaintiff, Gerald Watkins, Request the Defendant John Wetzel, admit to the following matter:

1. Defendant Wetzel, admit that you were the Pennsylvania DOC, Secretary for numerous years.
2. Defendant Wetzel, admit that you retired some time in the Fall/Autum of 2022.
3. Defendant Wetzel, admit that while you were the Secretary of the DOC all Capital Case Inmates that were sentenced to death (Given the death Penalty) who became prisoners of the state of Pa. and were tunred over to the Pa. DOC were denied due process, a hearing and immediately placed in solitary confinement until a death warrant was issued or the death sentence was vacated and a life sentence was imposed, etc.,
4. Defendant Wetzel, admit that the Capital Case Inmates were

placed in solitary confinement upon entry in the Pa. DOC because they were given a death sentence not because of Pa. DOC regulation/policy.

5. Defendant Wetzel, admit that the capital case inmates were placed in solitary confinement upon entry even though they did not receive a misconduct.

6. Defendant Wetzel, admit that you are aware of Pennsylvania Laws pertaining to capital case inmates "terms of confinement" and "Method of Execution."

7. Defendant Wetzel, admit that Pennsylvania Statute 61 Pa. C.S.A. § 4303 "terms of confinement" state : Upon receipt of the warrant, the Secretary shall until infliction of the Death penalty or until lawful discharge from custody, keep the inmate in solitary confinement.

8. Defendant Wetzel, Admit a capital case inmates, capital case is on appeal and no death warrant (receipt of warrant) has been signed he/she should not be in solitary confinement unless according to Pa. ST. 61 Pa. C.S.A. Sec. 4303. Unless, the capital case inmate violated any Pa. DOC rules or regulations/policy and received a misconduct.

9. Defendant Wetzel, admit that Pa. DOC capital case rules and regulations/policy, violated Pa. ST. 61 Pa. C.S.A. Sec. 4303 up until a settlement was reached in **Reid V. Wetzel**, January 2018.

10. Defendant Wetzel, admit as an employee of the state, specifically Secretary of the Pa. DOC that you had an obligation to uphold and enforce Pa. State Law, Pertaining to Capital Case Inmates under Pa. ST. 61 Pa. C.S.A. Sec. 4303 "terms of Confinement" and Sec. 4303 "Method of Execution".

11. Defendant Wetzel, admit that the Pennsylvania State legislature pass laws for the state of Pennsylvania (Resident or Visitor) including capital case inmates.

12. Defendant Wetzel, Admit, that all the rights and privileges Pa. DOC inmates have come from laws the Pa. State Legislature passed into law (Act) which are then turned into Pa. Statutes.

13. Defendant Wetzel admit that the only Pa. DOC Policy, Rules and

Regulations pertaining to capital case inmates you were permitted to make or enforce had to derive from Pennsylvania Law(s) that the state legislature passed .

14. Defendant Wetzel admit, that Pa. DOC capital case rules and regulations 6.5.8., did not derive from 61 Pa. C.S.A. sec 4303 "terms of Confinement" or any other law that the state legislature passed, pertaining to capital case inmates.

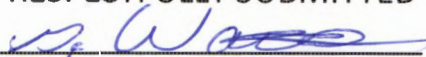
15. Defendant Wetzel, admit, that you are aware of the *Thomas James Report* pertaining to the Psychological Harm to a a person who is placed in long term solitary isolation.

16. Defendant Wetzel, admit that in **Johnson V. Wetzel, 208 F.App. 3rd 766, 2016 U.S. Lexis 127780**, you admitted to knowing for years that long term permanent solitary confinement causes permanent damage to a person physically and psychologically.

17. Defendant Wetzel, admit that you were fully aware of the physical and Psychological Damage and harm long term solitary confinement could have on capital case prisoners in the Pa. DOC.

18. Defendant Wetzel, admit you knew by keeping Pa. DOC capital case inmates in long term solitary isolation when no death warrant signed was illegal and not Penologically Jusified. According to Pa. ST. 61 C.S.A. Sec. 4303 "terms of Confinement".

RESPECTFULLY SUBMITTED



GERALD WATKINS, DD-5212

1200 MOKYCHIC DRIVE

COLLEGEVILLE, PA. 19426

3/1/2023

)(
)(Hon: Christopher C. Conner
)(M.J. Karoline Mechalechick
)(
)(Case No: 3:21-cv-1819
)(
)(

I, the undersigned hereby certify that on this 25th day of February, 2023, I have served a true and correct copy of the hereto attached admissions to the Defendants, via First Class Mail, which service satisfy the Court requirements.

To: Ms. Kimberly Adams, ESQ.
1920 Technology Parkway
Mechanicsburg, Pa. 17050

D. Wass

GERALD WATKINS, DD-5212
1200 MOKYCHIC DRIVE
COLLEGEVILLE, PA. 19426

G. Watkins

~~Smart Communications/PAGE~~

~~SO~~ DD-5212

~~Name~~ BOX 244

~~Number~~ Collegeville, PA

~~PO Box 33628~~ 194206-0244

~~St Petersburg FL 33733~~

PA DEPARTMENT OF
CORRECTIONS
INMATE MAIL

Office Of The Clerk
UNITED STATES DISTRICT COURT
Middle District Of Pennsylvania
U.S. Courthouse
228 Walnut Street
P.O. Box 983
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